

Berry, David P.

From: [REDACTED] Board Staff Ally
Sent: Friday, September 16, 2011 12:12 PM
To: Flynn, Terence F.
Subject: RE: Pre-recognition bargaining

Not that I am aware of. There would be little reason, post-Dana, for issuance of a complaint based on anything short of a complete cba and recognition prior to proof of majority.

From: Flynn, Terence F.
Sent: Friday, September 16, 2011 10:50 AM
To: [REDACTED] Board Staff Ally
Subject: Pre-recognition bargaining

Have we seen any post-Dana-C cases dealing with the parameters of permissible pre-recognition negotiations under the majority's "case-by-case" Dana regime?